

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

HILTON HEAD HOLDINGS b.v., on its own behalf  
and derivatively on behalf of Art Capital Group,  
Inc.,

Plaintiffs,

v.

IAN PECK, ART CAPITAL GROUP, INC., FINE  
ART FINACE LLC, ART CAPITAL GROUP, LLC,  
ACG CREDIT COMPANY, LLC, ACG FINANCE  
COMPANY, LLC; ACG CREDIT COMPANY II,  
LLC, ACG CREDIT COMPANY III, LLC, ACG  
FINANCE COMPANY III, LLC, AMERICAN  
PHOTOGRAPHY LLC, and other unknown  
affiliated business organizations that cannot be  
readily identified at this time,

Defendants.

Docket No. 11-CIV-7768 (KBF) (MHD)

**DISCLOSURE STATEMENT PURSUANT TO  
RULE 7.1 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, defendants, through their undersigned counsel, state as follows: (i) nongovernmental corporate defendants Fine Art Finance, LLC, ACG Credit Company, LLC, ACG Finance Company, LLC, ACG Credit Company II, LLC, ACG Credit Company III, LLC and American Photography, LLC are wholly owned subsidiaries of Art Capital Group, LLC, (ii) nongovernmental corporate defendant Art Capital Group, LLC has no parent company or any publicly held corporation owning 10% or more of its stock, and (iii) nongovernmental corporate defendant Art Capital Group, Inc. has no parent company or any publicly held corporation owning 10% or more of its stock.

Date: New York, New York  
December 9, 2011

SCHIFF HARDIN LLP

By: /s/ Mathew B. West  
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